

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION**

LETASHA MYATT, on behalf of herself)
and others similarly situated,)

Plaintiff,)

v.)

CASE NO. 1:10-CV-64-TLS

ALLEN COUNTY SHERIFF KEN FRIES)
(in his official capacity),)

Defendant.)

PLAINTIFF'S PROPOSED VERDICT FORM

Plaintiff, LeTasha Myatt, on behalf of herself and others similarly-situated, by counsel, requests that the Court submit to the jury, after the close of evidence and final argument, the following proposed Verdict Form.

Respectfully submitted,

CHRISTOPHER C. MYERS & ASSOCIATES

s/Christopher C. Myers

Christopher C. Myers, #10043-02

809 South Calhoun Street, Suite 400

Fort Wayne, IN 46802-2307

Telephone: (260) 424-0600

Facsimile: (260) 424-0712

E-mail: cmyers@myers-law.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby swears that a true and correct copy of the foregoing document was sent, via United States Mail, ECF, postage prepaid, or by some other means acceptable to this Court, on this 15th day of December, 2014, to the following:

John O. Feighner
J. Spencer Feighner
Haller & Colvin, P.C.
444 E. Main Street
Fort Wayne, IN 46802-1910

s/Christopher C. Myers
Christopher C. Myers

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PLAINTIFF'S PROPOSED VERDICT FORM NO. 1

We the jury, on the issue of the value of the loss of liberty suffered by the Plaintiff and others similarly-situated, determine that value of the loss of liberty is to be measured at the rate of \$_____ per hour for each hour of deprivation of liberty suffered by each class member.

Date:_____

Foreman